

SUPERIOR COURT

OF THE

DISTRICT OF COLUMBIA

SUPERIOR COURT OF  
THE DISTRICT OF COLUMBIA  
CRIMINAL DIVISION

2012 OCT 23 P 4: 14

Holding a Criminal Term

FILED

Grand Jury Sworn in on September 19, 2011

THE UNITED STATES OF AMERICA	:	Criminal Nos: 2009 CF1 002319 (Carlton)
	:	2010 CF1 014920 (Givens)
v.	:	2011 CF1 023409 (Black)
	:	2011 CF1 023408 (Jackson)
LAFONTE L. CARLTON,	:	2011 CF1 023407 (Johnson)
also known as Fonte	:	2011 CF1 023394 (Williams)
also known as Fonny	:	
PDID: 583-006	:	Violations:
	:	22 D.C. Code, Section 1805a;
ROBERT GIVENS,	:	22 D.C. Code, Sections 2101, 4502;
also known as Chop	:	22 D.C. Code, Sections 401, 4502;
also known as Chopper	:	22 D.C. Code, Section 4504(b);
also known as Flaca	:	22 D.C. Code, Section 4504(a);
PDID: 624-234	:	22 D.C. Code, Sections 2802, 4502, 1803;
	:	23 D.C. Code, Section 1328(a)(1);
DEVYN L. BLACK,	:	22 D.C. Code, Section 405(b);
also known as Bunz	:	22 D.C. Code, Section 407;
also known as Hamburger	:	22 D.C. Code Section 722(a)(6);
PDID : 572-314	:	23 D.C. Code, Section 1110;
	:	22 D.C. Code, Section 2603.02(b);
MARCELLUS E. JACKSON,	:	22 D.C. Code, Section 401;
also known as Cool	:	7 D.C. Code, Section 2502.01(a)
PDID: 570-973	:	7 D.C. Code, Section 2506.01(3)
	:	22 D.C. Code, Section 951(b)(1) (2001 ed.)
KEIR M. JOHNSON,	:	
also known as Frank White	:	(Conspiracy; First Degree Murder While
also known as K	:	Armed (Premeditated); Assault With Intent To
also known as Ki	:	Kill While Armed; Possession Of a Firearm
PDID: 607-725	:	During Crime Of Violence Or Dangerous
	:	Offense; Carrying a Pistol Without a License
LESTER D. WILLIAMS,	:	(Outside Home or Place of Business); Attempt
also known as Les	:	To Commit Robbery While Armed; Offenses
PDID: 582-771	:	Committed During Release;

(Continued on next page)

: Assaulting, Resisting or Interfering with a  
: Police Officer (Misdemeanor); Threats To Do  
: Bodily Harm; Obstructing Justice (Due  
: Administration of Justice); Failure to Appear;  
: Unlawful Possession of Contraband In A Penal  
: Institution; Assault With Intent To Kill;  
: Possession of Unregistered Firearm; Unlawful  
: Possession of Ammunition; Criminal Street  
: Gang Affiliation)

Superseding Indictment

The Grand Jury charges:

FIRST COUNT:

From or about July 1, 2006 to the present, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," Ricardo D. Epps, also known as "Cardo," Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," and other persons whose identities are known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree together to commit robberies, possess firearms, threaten, assault, and kill anyone whose interests were contrary to those of the defendants and their associates, and to obstruct justice, in violation of 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 7 D.C. Code Section 2502.01.

### Background of the Conspiracy

From on or about July 1, 2006 to the present, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," Ricardo D. Epps, also known as "Cardo," Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," and other persons whose identities are known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree together to threaten, assault, and kill anyone whose interests were contrary to those of the defendants and their associates in the criminal organization known by various names, including but not limited to, "14th and Girard," "1-4," "G-rod," or "Cut Crew," and to obstruct justice in order to prevent the successful prosecution by law enforcement of defendants and their associates in that criminal organization, in violation of 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 7 D.C. Code Section 2502.01.

### Object

At all times relevant to this Indictment the defendants and others known and unknown to the Grand Jury were members of the criminal organization known by various names, including but not limited to, "14th and Girard," "1-4," "G-rod," or "Cut Crew," (hereinafter referred to as "G-Rod" in the case of the criminal organization, and in the case of members, by name, alias, or a designated number, such as "G-rod member #1") a criminal street gang whose object was to control for its exclusive use, criminal and otherwise, the area centering on the 1400 block of Girard Street N.W. and the 1400 block of Fairmont Street, N.W., and including the surrounding territory, the boundaries of which fluctuated over time but generally consisted of an area bounded by Columbia Street, N.W., to the north, Fairmont Street, N.W., to the south, 16th Street, N.W., to the west, and Georgia Avenue, N.W., to the east (hereinafter the "turf"), and to avoid detection and successful prosecution by law enforcement.

### Goal

At all times relevant to this Indictment the goal of the defendants and their associates in the criminal organization known as G-Rod was to control its turf and avoid detection and successful prosecution by law enforcement using intimidation, threats, and violence, and by obstructing justice in violation of 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 7 D.C. Code Section 2502.01.

### Manners and Means

The defendants and their associates in G-Rod shared numerous common factors. They were residents of or otherwise associated with the turf and its environs. They were dedicated to reserving their turf to their exclusive use for criminal and or legitimate use and to avoid detection and successful prosecution by law enforcement. They were prepared to commit and did commit acts of intimidation, threats, violence, and obstruction of justice to exercise that control, avoid successful prosecution by law enforcement, and enhance the reputation of G-Rod for using intimidation, threats, and violence and thus facilitate G-Rod's control of the turf. In order to control, safeguard and protect G-Rod's turf and base of operations, and avoid detection and successful prosecution by law enforcement, the defendants and their associates in G-Rod used the following manners and means to advance their conspiracy:

(1) Members of G-Rod threatened, assaulted, or killed anyone whose interests were contrary to those of G-Rod, particularly members of rival criminal street gangs, including but not limited to, a criminal street gang known as "17th and Euclid" or "1-7" (hereinafter referred to as "1-7" in the case of the gang, and in the case of members, by name or alias), a criminal street gang known as "640," or "Park Morton" (hereinafter referred to as "640" in the case of the gang, and in the case of members, by name or alias), and a criminal street gang known as "Columbia Heights Village," "CHV," or the "V" (hereinafter referred to as "CHV" in the case of the gang, and in the case of members, by name or alias);

- (2) Members of G-Rod retaliated for acts of violence perpetrated against other members of G-Rod;
- (3) Members of G-Rod promoted and enhanced the reputation and stature of G-Rod;
- (4) Members of G-Rod used acts of intimidation, threats, promises, bribes, and violence to protect the conspiracy and its members from detection, investigation, apprehension, and prosecution by law enforcement and from conviction of criminal charges, including by retaliation against anyone who assisted law enforcement officials in the investigation into and prosecution of members of G-Rod;
- (5) Members of G-rod maintained regular contact with each other, even when they were arrested or incarcerated, to stay advised of the activities of other members of the conspiracy as well as to seek their assistance in locating and deterring witnesses from cooperating with law enforcement against G-rod members and their associates;
- (6) Members of G-rod shared intelligence about the activities and locations of members of the conspiracy and their associates and members of rival criminal street gangs;
- (7) Members of G-rod shared intelligence about the activities and locations of law enforcement and persons suspected of cooperating with law enforcement;
- (8) Members of G-rod obtained, possessed, and shared weapons;
- (9) Members of G-Rod financed the operations and lifestyle of the conspiracy's members and associates through robberies and trafficking in controlled substances, including sharing stash houses to process and store narcotics and sharing narcotics suppliers; and
- (10) Members of G-rod protected illicit profits generated by the involvement of the conspiracy's members and associates in narcotics trafficking and robberies.

### Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the defendants and other persons whose identities are known and unknown to the grand jury, directly and indirectly, committed the following overt acts, among others, in the District of Columbia and elsewhere:

1. On or about December 23, 2006, Marcellus E. Jackson, carried a firearm in the area of the 1400 block of Girard Street, N.W., Washington, D.C.
2. On or about June 30, 2007, Marcellus E. Jackson, carried a firearm in the area of the 1500 block of Columbia Road, N.W., Washington, D.C.
3. On or about October 14, 2008, Devyn Black, did possess a firearm in the 1400 block of Girard Street, N.W., Washington, D.C.

### Murder of Derrell Goins and Shooting of Seandell Robinson

4. On or about December 10, 2008, in the District of Columbia, Lafonte L. Carlton and Devyn L. Black went together to the area of the 2200 block of Champlain Street, N.W., Washington, D.C. for the purpose of locating and assaulting persons associated with the rival 1-7 crew.
5. On or about December 10, 2008, Lafonte L. Carlton and Devyn L. Black shot and killed Derrell Goins, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in an alley in the 2200 block of Champlain Street, N.W., Washington D.C.
6. On or about December 10, 2008, Lafonte L. Carlton and Devyn L. Black shot Seandell Robinson, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in an alley in the 2200 block of Champlain Street, N.W., Washington D.C.
7. On or about December 10, 2008, Lafonte L. Carlton and Devyn L. Black shot at Denzil White, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in an alley in the 2200 block of Champlain Street, N.W., Washington D.C.

Attempted Robbery and Shooting of Nathaniel Morrison

8. On or about January 3, 2009, Devyn L. Black, while armed with a firearm, together with another person whose identity is unknown to the grand jury, demanded money from Nathaniel Morrison in the 1400 block of Fairmont Street, N.W., Washington, D.C.
9. On or about January 3, 2009, Devyn L. Black, while armed with a firearm, together with another person whose identity is unknown to the grand jury, shot Nathaniel Morrison in the 1400 block of Fairmont Street, N.W., Washington, D.C.

Murder of Paul Jones and Shooting of Theodore Rhem

10. On or about January 9, 2009, in the District of Columbia, Lafonte L. Carlton, Devyn L. Black, Lester D. Williams and other persons whose identities are known and unknown to the grand jury, met and discussed a plan to assault a person or persons associated with the "V," meaning the rival CHV crew.
11. On or about January 9, 2009, Lafonte L. Carlton, Devyn L. Black, Lester D. Williams, and other persons whose identities are known and unknown to the grand jury, went together to the area of the Columbia Heights Village located at the intersection of 14<sup>th</sup> and Columbia Road, N.W., Washington, D.C, for the purpose of locating and assaulting persons associated with the rival CHV crew.
12. On or about January 9, 2009, Lafonte L. Carlton, Devyn L. Black, Lester D. Williams, and other persons whose identities are known and unknown to the grand jury, chased, shot and killed Paul Jones, a person associated with the rival CHV crew, in the 1300 block of Columbia Road, N.W., Washington D.C.

13. On or about January 9, 2009, Lafonte L. Carlton, Devyn L. Black, and Lester D. Williams shot Theodore Rhem with the intent to kill Paul Jones in the 1300 block of Columbia Road, N.W., Washington D.C.

Arrest of Lafonte Carlton and Lester D. Williams

14. On or about January 13, 2009, Lafonte L. Carlton carried a pistol without a license in the area of the 1300 block of Girard Street, N.W., Washington D.C.
15. On or about January 13, 2009, Lester D. Williams assaulted a police officer while the officer was arresting Lafonte L. Carlton for carrying a pistol without a license, as set forth in Overt Act (14) above, in the area of the 1300 block of Girard Street, N.W., Washington D.C.
16. On or about January 13, 2009, Lafonte L. Carlton, and Lester D. Williams, after being arrested for the offenses referred to in Overt Acts (14-15) above, discussed and agreed to tell law enforcement and other persons they did not know each other in order to avoid successful prosecution.

Events From February 2009 until March 2009

17. On or about February 3, 2009, at approximately 7:11 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with an unindicted co-conspirator, whose identity is known to the grand jury (hereinafter "G-rod member #1"), and discussed steps that could be taken to disassociate Carlton from Lester D. Williams in order to hinder the prosecution of Carton and Williams for the shootings of Paul Jones and Theodore Rhem on January 9, 2009 and the carrying a pistol without a license and assault on a police officer committed on January 13, 2009, during which G-rod member #1 explained that IT planned to meet with "Les," meaning Lester D. Williams, the next day, and Carlton further stated that he and Williams had "already talked about that" and agreed "like when we get [sic] locked up, we already, you know, said we ain't know each other."



18. On or about February 3, 2009, at approximately 7:43 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Devyn L. Black and Lester D. Williams and discussed protecting the brother of Carlton, a member of G-rod, because Carlton was incarcerated and unable to do so; Williams' meeting with G-rod member #1 in order to discuss the steps G-rod members were taking to hinder the prosecution of Carlton and Williams; the names and activities of potential witnesses to the shootings of Paul Jones and Theodore Rhem and that these matters should not be discussed over the recorded telephones at the jail.
19. On or about February 24, 2009, at approximately 9:31 p.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with an unindicted member of G-rod, whose identity is unknown to the grand jury (hereinafter referred to as "G-rod member #2"), and discussed the failure of G-rod members to take action against persons Carlton identified as possibility cooperating with law enforcement against him, during which conversation, G-Rod Member #2 further stated that, "That shit far from over," and Carlton responded, "Oh yeah, most definitely."
20. On or about February 26, 2009, at approximately 9:44 p.m., in the District of Columbia, Lafonte L. Carlton, spoke with Devyn L. Black regarding the identity of the witnesses who were providing information to law enforcement about the shootings of Paul Jones and Theodore Rhem, and precautions to take when communicating with Carlton through letters because law enforcement personnel would open and review inmate letters.
21. On or about March 3, 2009, at approximately 7:36 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Keir M. Johnson regarding Carlton's safety at the District of Columbia jail and his need to be near other members of G-rod at that location, and exchanged information regarding the identity and locations of persons that may be providing information to law enforcement about the shootings of Paul Jones and Theodore Rhem.

### Shooting of Anthony Butler

22. On or about June 18, 2009, Devyn L. Black shot Anthony Butler, a person associated with the rival CHV crew, after demanding Butler's necklace at gunpoint, in the area of the Columbia Heights Metro Station in the 1400 block of Irving Street.

### Events From October 2009 Through August 2010

23. On or about October 14, 2009, in the District of Columbia, Devyn L. Black wrote a letter to Lafonte L. Carlton asking when Carlton's trial was scheduled and whether Carlton "ever [found] out who eatin that cheese," meaning whether Carlton had ever determined the identity of government witnesses in the Paul Jones murder case.
24. On or about July 17, 2010, a rap music video was created and posted on the Internet by a unindicted member of the conspiracy, whose identity is known to the grand jury, that promoted G-rod's reputation, membership, and the consequences when persons cooperate against its members with law enforcement.
25. Between on or about August 1, 2010 and on or about September 1, 2010, in the District of Columbia, Marcellus E. Jackson asked Brandon Miller to hold onto a bag containing ammunition for Jackson, which Miller agreed to accept and store at 1211 Girard Street, N.W., Washington, D.C.
26. Between on or about August 1, 2010 and on or about September 1, 2010, Brandon Miller met Keir M. Johnson at Johnson's apartment located at 1401 Fairmont Street, N.W., Apartment 112, Washington, D.C., at which time, Johnson gave Miller a bag containing an AK-47 style assault rifle and ammunition for that rifle, which Miller then stored at 1211 Girard Street, N.W., Washington, D.C.

27. Between on or about August 1, 2010 and on or about September 1, 2010, in the District of Columbia, Marcellus E. Jackson contacted Brandon Miller and asked him to hold onto a "Tec-22" machine gun and Miller agreed to do so.
28. Between on or about August 1, 2010 and on or about September 1, 2010, Brandon Miller met Marcellus E. Jackson in the approximate area of the 1400 block of Girard Street, N.W., Washington, D.C. and Jackson gave Miller a bag containing a "Tec-22" machine gun, which Miller then stored at 1211 Girard Street, N.W., Washington, D.C.

Shooting of Kevin Parker and Delontae Kelly

29. On or about June 27, 2010, Keir Johnson rode in a vehicle with an unindicted member of G-rod, whose identity is known to the grand jury (hereinafter referred to as "G-rod member #4"), into the parking lot of a gas station located in the 3400 block of Georgia Avenue, N.W., Washington, D.C., for the purpose of shooting at Kevin Parker and Delontae Kelly, two persons associated with the rival 640 crew.
30. On or about June 27, 2010, Keir Johnson chased and shot Kevin Parker, a person associated with the rival 640 crew, in the parking lot of the gas station located in the 3400 block of Georgia Avenue, N.W., Washington, D.C.
31. On or about June 27, 2010, Keir Johnson chased and shot at Delontae Kelly, a person associated with the rival 640 crew, in the parking lot of the gas station located in the 3400 block of Georgia Avenue, N.W., Washington, D.C.

Murder of Sean Robinson and Shootings of T.B. and M.W.

32. On or about August 11, 2010, at approximately 6:42 p.m., in the District of Columbia, Marcellus E. Jackson exchanged a telephone call with Robert Givens.

33. On or about August 11, 2010, in the District of Columbia, Marcellus E. Jackson, while driving his dark-colored 2004 Audi, picked up Robert Givens and another person, whose identity is unknown to the grand jury, and drove them to the area of 17<sup>th</sup> and Euclid Street, N.W., Washington, D.C.
34. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, shot and killed Sean Robinson, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in the rear of the 2500 block of 17<sup>th</sup> Street, N.W., Washington, D.C.
35. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, shot at T.B., a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in the rear of the 2500 block of 17<sup>th</sup> Street, N.W., Washington, D.C.
36. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, shot at M.W., a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in the rear of the 2500 block of 17<sup>th</sup> Street, N.W., Washington, D.C.
37. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, entered the dark-colored 2004 Audi being driven by Marcellus E. Jackson near the intersection of Fuller and Mozart Streets, N.W., Washington, D.C., to escape after the shootings of Sean Robinson, T.B., and M.W, and Jackson drove them to the area of 14<sup>th</sup> and Fairmont Streets, N.W., Washington, D.C.
38. On or about August 11, 2010, at approximately 9:43 p.m., Robert Givens telephoned Marcellus E. Jackson, who was in the area of 14<sup>th</sup> and Fairmont Streets, N.W., Washington, D.C.
39. Between on or about August 11, 2010 and on or about September 17, 2010, in the District of Columbia, Marcellus E. Jackson burned or attempted to burn his 2004 dark-colored Audi in order to ensure it could not be located by law enforcement and identified as the vehicle used in the shootings of Sean Robinson, T.B. and M.W.

Events From August 13, 2010 Until September 28, 2011

40. On or about August 13, 2010, at approximately 4:35 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, during which conversation Carlton provided Epps with instructions to give to G-rod members involved in the murder of Sean Robinson in order to evade detection by law enforcement or retaliation by the 1-7 crew, with Carlton stating, “[T]ell him, man, make sure he stay low though man . . . Don’t, tell him, don’t be hanging up Girard man.”
41. On or about August 27, 2010, in the 1400 block of Girard Street, N.W., Washington, D.C., Keir M. Johnson and others who are unknown to the grand jury surrounded uniformed Special Police Officer Francis Maduwuba, after he warned Johnson that he was being too loud and told Johnson to leave the area at which time Johnson spit and threw a bottle at Officer Maduwuba.
42. Between on or about August 28, 2010 and on or about September 17, 2010, Keir M. Johnson approached uniformed Special Police Officer Francis Maduwuba in the 1400 block of Fairmont Street, N.W., Washington, D.C., and threatened him in reference to the investigation of Johnson’s assault on Officer Maduwuba on August 27, 2010 referred to in Overt Act (41) above, during which Johnson told Officer Maduwuba, “To mind [his] business [and Johnson would] mind his own business. That way nobody get hurt.”
43. On or about August 30, 2010, in the District of Columbia, Lafonte L. Carlton wrote a letter to Robert Givens informing him of the identity of a person who may be “hot and going on you,” meaning providing information to law enforcement against Givens in the investigation of the murder of Sean Robinson, and cautioned Givens about not making statements to law enforcement regarding Givens’ role in the murder of Sean Robinson.

44. On or about September 10, 2010, at approximately 2:21 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with an unindicted co-conspirator, referred to as "Buk," whose identity is known to the grand jury, during which Carlton informed "Buk" of Carlton's concerns that another member of G-rod, whose identity is known to the grand jury (hereinafter referred to as "G-rod member #3"), was "hot," meaning assisting law enforcement.
45. On or about September 10, 2010, at approximately 2:21 p.m. in the District of Columbia, Lafonte L. Carlton spoke by telephone with Lester D. Williams and informed him that Carlton had heard from other persons that an individual, who Carlton referred to as Williams' "man" and further identified as "Roland," was "hot," meaning assisting law enforcement, by "bringing undercovers around Benning Park and trying to buy guns and shit," and then Williams, who was with Marcellus E. Jackson, repeated the information about "Roland" he just received from Carlton to Jackson while Carlton remained on the phone.
46. On or about September 13, 2010, at approximately 6:50 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Keir M. Johnson and discussed how Carlton could obtain the assistance he needed to attack 1-7 Member "Fat Face" in the District of Columbia jail, their concerns that G-rod member #3 was "hot," meaning cooperating with law enforcement, and the steps Carlton planned to take to confront G-rod member #3.

Murder of Jamal Coates and Shootings of Phillip Thompkins and Mico Thompson

47. On or about September 28, 2010, Brandon Miller agreed to drive Lester D. Williams, Keir M. Johnson and Marcellus E. Jackson to the area of 13<sup>th</sup> and U Streets, N.W., Washington D.C.
48. On or about September 28, 2010, Brandon Miller stopped his vehicle, at the direction of Marcellus E. Jackson, in the area of the intersection of 12<sup>th</sup> and V Streets, N.W., Washington, D.C., at which time Jackson exited the vehicle.

49. On or about September 28, 2010, in the District of Columbia, Marcellus E. Jackson spoke by telephone with Brandon Miller and instructed Miller regarding the description of the vehicle which was occupied by rival 1-7 members near the intersection of 13<sup>th</sup> and U Streets, N.W., Washington, D.C.
50. On or about September 28, 2010, in the District of Columbia, Marcellus E. Jackson spoke by telephone with Brandon Miller and instructed Miller to provide Keir M. Johnson with the information set forth in Overt Act (49) above.
51. On or about September 28, 2010, near the intersection of intersection of 13<sup>th</sup> and U Streets, N.W., Washington, D.C., Lester D. Williams and Keir M. Johnson, while armed with firearms, exited Brandon Miller's vehicle for the purpose of shooting rival 1-7 members.
52. On or about September 28, 2010, Lester D. Williams and Keir M. Johnson shot and killed Jamal Coates, a rival 1-7 member, in the area of the 1300 block of U Street, N.W., Washington D.C.
53. On or about September 28, 2010, Lester D. Williams and Keir M. Johnson shot Philip Thompkins, a rival 1-7 member, in the area of the 1300 block of U Street, N.W., Washington D.C.
54. On or about September 28, 2010, Lester D. Williams and Keir M. Johnson shot at Mico Thompson, a rival 1-7 member, in the area of the 1300 block of U Street, N.W., Washington D.C.
55. On or about September 28, 2010, in the District of Columbia, Lester D. Williams and Keir M. Johnson reentered Brandon Miller's vehicle for the purpose of leaving the area after shooting at rival 1-7 members Jamal Coates, Phillip Thompkins, and Mico Thompson.
56. On or about September 28, 2010, in the District of Columbia, Keir M. Johnson asked Brandon Miller to store the firearms in his family residence used by Johnson and Lester D. Williams in the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.

Events from September 29, 2010 Until Present

57. Between on or about September 29, 2010 and on or about November 30, 2010, in the District of Columbia, Marcellus E. Jackson asked a person, whose identity is known to the grand jury (hereinafter referred to as "Person A"), to conduct a "three-way" telephone conversation with Miller, for purpose of ensuring Miller was not cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson, and Jackson further stated to Person A that after the "three-way" call, the child of Brandon Miller would be taken care of for the rest of ITS life.
58. On or about September 30, 2010, at approximately 9:03 a.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding Brandon Miller's arrest and whether Miller would likely cooperate with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson, during which conversation Epps stated that Carlton should confront Brandon Miller at the District of Columbia jail to convince him not to cooperate with law enforcement.
59. On or about October 1, 2010, at approximately 4:55 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps and instructed him on the precautions G-rod members should take to avoid detection by law enforcement as a result of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.
60. On or about October 4, 2010, at approximately 10:14 a.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding whether Brandon Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.



61. On or about October 4, 2010, at approximately 10:36 a.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding the possibility that the rival 1-7 crew would retaliate against Epps.
62. On or about October 26, 2010, at approximately 6:25 p.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding concerns that Lester D. Williams was providing information to other persons that was being leaked to law enforcement.
63. On or about November 1, 2010, at approximately 10:17 p.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding whether Brandon Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.
64. On or about November 2, 2010, at approximately 2:07 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton and Johnson discussed whether Brandon Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompkins and Mico Thompson; Carlton's efforts to locate Miller at the jail; and Carlton's concern that Lester D. Williams was not maintaining a low-enough profile after the events of September 28, 2010.
65. On or about November 3, 2010, at approximately 7:03 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Marcellus E. Jackson, Jackson and Carlton agreed to send messages through Epps because jail telephone calls are recorded, and Carlton, Jackson, and Epps discussed whether Brandon Miller was cooperating with law enforcement, Miller's whereabouts, and the steps they could take to locate Miller.

66. On or about November 3, 2010, at approximately 10:06 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton and Johnson discussed whether Brandon Miller was cooperating with law enforcement, Miller's whereabouts, and the steps they could take to locate him, during which conversation Johnson asked Carlton whether he could obtain a "census sheet," meaning a document listing the locations of inmates.
67. On or about November 5, 2010, Ricardo D. Epps, attended a court hearing scheduled in the case of *United States v. Brandon Miller*, docket number 2010CF1018340, in courtroom 215 of the District of Columbia Superior Court, 500 Indiana Avenue, N.W., Washington, D.C, to determine whether Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompsons and Mico Thompson.
68. On or about November 5, 2010, at approximately 7:35 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Lester D. Williams, Carlton discussed with Williams precautions that Williams should take to avoid detection by law enforcement and retaliation from the rival 1-7 crew, the whereabouts of Brandon Miller, steps they could take to locate Brandon Miller, and the location of rival 1-7 member Phillip Thompsons at the District of Columbia jail.
69. On or about November 5, 2010, at approximately 7:51 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding what happened when Epps attended the court hearing in the case against Brandon Miller earlier in the day and Epps' concerns, based on his observations, that Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompsons, and Mico Thompson.

70. On or about November 5, 2010, at approximately 7:51 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Lester D. Williams regarding Carlton's plan to contact 1-7 member Phillip Thompson to convince Thompson not to cooperate with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompson, and Mico Thompson.
71. On or about November 5, 2010, at approximately 8:21 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Keir M. Johnson, during which conversation Johnson instructed Carlton not to contact 1-7 member Phillip Thompson in an effort to get Thompson to refuse to cooperate with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Thompson, and Mico Thompson.
72. On or about November 5, 2010, at approximately 8:21 p.m., in the District of Columbia, Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson discussed in a telephone conversation what happened when Epps attended the court hearing in the case against Brandon Miller earlier in the day, whether Brandon Miller was cooperating with law enforcement, and Miller's whereabouts.
73. On or about November 5, 2010, at approximately 8:36 p.m., in the District of Columbia, Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson discussed in a telephone conversation their ongoing efforts to locate Brandon Miller, during which conversation Johnson asked Carlton whether he had ever "check[ed] into them census sheets" used to track inmates, and Carlton, Epps, and Johnson discussed how a "census sheet" could be obtained.

74. On or about November 9, 2010, at approximately 11:19 a.m., in the District of Columbia, an unindicted co-conspirator known as "Big Dave," spoke with Marcellus E. Jackson by telephone, during which conversation "Big Dave" and Jackson discussed information "Big Dave" had received that Brandon Miller had been sent from the District of Columbia jail's protective custody unit to a facility in Virginia.
75. On or about November 9, 2010, at approximately 9:20 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, during which conversation Epps informed Carlton that Epps had been "subpoenaed" to appear before the grand jury in the case against "El's brother," meaning the case against Robert Givens for the murder of Sean Robinson, and Carlton and Epps agreed that they needed to stop using the recorded jail phones because they were being monitored by law enforcement.
76. On or about November 9, 2010, at approximately 9:36 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Marcellus E. Jackson, Carlton asked Jackson for money so that Carlton could obtain a cell phone at the jail to enable him to "call straight to ya'll" without using the recorded jail phones, and Jackson agreed to help provide the funds.

77. On or about November 10, 2010, Ricardo D. Epps, after being served with a subpoena to testify before a District of Columbia Superior Court grand jury investigating the case of *United States v. Robert Givens*, docket number 2010CF1014920, appeared at 555 4<sup>th</sup> Street, N.W., Washington, D.C., the location of the grand jury and the Office of the United States Attorney for the District of Columbia, and Epps falsely stated during an interview with an Assistant United States Attorney and members of the Metropolitan Police Department that he was not part of the “beef” or conflict between G-rod and 1-7 and that he had no knowledge about the shootings of Sean Robinson, T.B., and M.W.
78. On or about November 11, 2010, at approximately 4:56 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding the events that occurred when Epps responded to a subpoena to appear before the grand jury and their concerns about the government’s investigation, during which conversation Epps instructed Carlton that he needed to stop “writing them letters” to other persons, such as other members of G-rod.
79. On or about November 11, 2010, at approximately 5:12 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton and Johnson discussed the events that occurred when Epps responded to a subpoena to appear before the grand jury, their concerns persons were cooperating with law enforcement, the need to stop talking over recorded jail telephones, and Carlton’s plans to obtain money from Marcellus E. Jackson so that he could communicate with Johnson and others using a cell phone.

80. On or about November 11, 2010, at approximately 9:28 p.m., in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton informed Johnson and Epps of the amount of money he needed, beyond the amount promised by Marcellus E. Jackson, in order for Carlton to obtain a cell phone to communicate with them because he did not want to use the recorded jail phones anymore, and Johnson and Epps agreed to provide him with funds.
81. On or about November 17, 2010, at approximately 6:43 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding persons that may be cooperating with law enforcement, the steps Epps should take to avoid being recorded by law enforcement, and the code they agreed to use when referring to other members of G-rod as a result of their concerns about law enforcement monitoring their conversations.
82. On or about November 17, 2010, at approximately 7:00 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding Epps' next scheduled date to testify before a District of Columbia Superior Court grand jury, during which conversation Carlton instructed Epps that he could answer some of the questions in the grand jury if he wanted to, but that for any "wild" questions, Epps should just "plead the Fifth."
83. On or about November 18, 2010, at approximately 1:17 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, during which conversation they discussed the following: Carlton instructed Epps to inform other members of G-rod, including Marcellus E. Jackson, that the police had searched Carlton's jail cell and taken group photos and telephone numbers; Carlton further stated that they needed to change their telephone numbers; Epps agreed to "make sure I tell them" and "send a message up there," and that in future conversation, Carlton and Epps agreed they would "talk in person" because of concerns their telephone conversations were recorded and monitored.

84. Between on or about January 1, 2011 and on or about January 28, 2011, in the District of Columbia, Marcellus E. Jackson asked Person A to conduct a “three way” telephone conversation with Jackson when the other person spoke on the telephone with Brandon Miller.
85. On or about January 28, 2011, Brandon Miller spoke on the telephone with Marcellus E. Jackson, during which conversation Jackson instructed Miller not to talk on recorded jail phones or to persons he did not know; Jackson agreed to pass on a message from Miller to Keir M. Johnson and Lester D. Williams that Miller did not intend to cooperate with law enforcement against them in the investigation of the shootings of Jamal Coates, Phillip Thompkins, and Mico Thompson; and Jackson promised Miller that he would send him money and take care of him and his family.
86. On or about February 13, 2011, at approximately 9:35 p.m., in the District of Columbia, Robert Givens spoke on the telephone with a person whose identity is unknown to the grand jury, during which conversation Givens informed the person that he saw Brandon Miller at the jail, but Givens did not confront Miller because, among other reasons, Miller knew too much about Givens.
87. On or about February 16, 2011, at approximately 12:20 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding how law enforcement could have learned that Carlton had arranged to have Devyn L. Black transferred from an out-of-state prison to the District of Columbia jail; that Devyn L. Black had been questioned by law enforcement about, among other things, Keir M. Johnson; concerns that law enforcement may be learning information by monitoring Carlton’s recorded jail calls with Epps, and Carlton’s need to “get a phone,” meaning a cell phone, so that he could make unrecorded calls.
88. On or about May 16, 2011, Lafonte L. Carlton, possessed a hand-made knife and a handcuff key inside the District of Columbia jail in the event that he encountered a member of the rival 1-7 crew.

89. On or about May 16, 2011, at the District of Columbia jail, Lafonte L. Carlton, assaulted and stabbed 1-7 member Joseph McCrae, also known as "Fat Face" or "Poe," with the hand-made knife described in Over Act (88) above.
90. On or about June 23, 2011, at approximately 11:08 a.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, who relayed messages between Carlton and Devyn L. Black, whom Epps was speaking to on another telephone line, during which conversation Carlton instructed Epps to tell Black that someone was providing information to law enforcement in the case against Carlton for the murder of Paul Jones.
91. On or about June 23, 2011, at approximately 11:08 a.m., Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding the identity of a person that, based on Carlton's conversation with a rival member of 1-7 referred to as "Torian," Carlton believed was cooperating with law enforcement in the case against Robert Givens for the shootings of Sean Robinson, M.W., and T.B., and Epps instructed Carlton that he should "glass that nigga," meaning assault "Torian," rather to speak with him.
92. On or about December 5, 2011, Lester D. Williams, did possess a firearm at 1437 Somerset Street, N.W., Washington D.C.

(Conspiracy, in violation of 22 D.C. Code, Section 1805a (2011 ed.)).



Murder of Derrell Goins and Shooting of Seandell Robinson

SECOND COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," while armed with a firearm, purposely and with deliberate and premeditated malice, killed Derrell Goins with a firearm on or about December 10, 2008, thereby causing injuries from which Derrell Goins died on or about December 10, 2008. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

THIRD COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," while armed with a firearm, assaulted Seandell Robinson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FOURTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," while armed with a firearm, assaulted Denzil White with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FIFTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of first degree murder while armed as set forth in the second count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SIXTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SEVENTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

EIGHTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did carry, openly and concealed on or about their persons, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Attempted Robbery and Shooting of Nathaniel Morrison

NINTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," together with another person whose identity is unknown to the grand jury, while armed with a firearm, did attempt, by force and violence, against resistance and by putting in fear, to steal and take money, from the person and from the immediate actual possession of Nathaniel Morrison. (Attempt To Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.))

TENTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," together with another person whose identity is unknown to the grand jury, while armed with a firearm, assaulted Nathaniel Morrison with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

ELEVENTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of attempt to commit robbery while armed as set forth in the ninth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWELFTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the tenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTEENTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Murder of Paul Jones and Shooting of Theodore Rhem

FOURTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, in perpetrating and attempting to perpetrate the crime of robbery, killed Paul Jones by shooting him, thereby causing injuries from which Paul Jones died on or about January 9, 2009. (First Degree Murder While Armed - Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

FIFTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, purposely and with deliberate and premeditated malice, killed Paul Jones with a firearm on or about January 9, 2009, thereby causing injuries from which Paul Jones died on or about January 9, 2009. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

SIXTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, did attempt, by force and violence, against resistance and by putting in fear, to steal and take money or other items of value, from the person and from the immediate actual possession of Paul Jones. (Attempt To Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.))

SEVENTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, assaulted Theodore Rhem with intent to kill Paul Jones. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

EIGHTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of first degree murder while armed – felony murder as set forth in the fourteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

NINETEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of first degree murder while armed as set forth in the fifteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWENTIETH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of attempted robbery while armed as set forth in the sixteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWENTY-FIRST COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the seventeenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWENTY-SECOND COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

TWENTY-THIRD COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," having previously been released pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2008CMD27895, committed while so released the crimes of murder, assault with intent to kill, possession of a firearm during a crime of violence or dangerous offense, and carrying a pistol without a license (outside home or place of business), which are all felonies, as set forth in the fourteenth to twenty-second counts of this indictment. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328(a)(1))

TWENTY-FOURTH COUNT:

On or about January 13, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

TWENTY-FIFTH COUNT:

On or about January 13, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," having previously been released pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2008CMD27895, committed while so released the crime of carrying a pistol without a license, a felony, as set forth in the twenty-fourth count of this indictment. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328(a)(1))



Shooting of Kevin Parker and Delontae Kelly

TWENTY-SIXTH COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” while armed with a firearm, assaulted Kevin Parker with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

TWENTY-SEVENTH COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” while armed with a firearm, did by any means, knowingly and purposely cause serious bodily injury to Kevin Parker. (Aggravated Assault While Armed, in violation of 22 D.C. Code, Section 404.01, 4502 (2001 ed.))

TWENTY-EIGHTH COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” while armed with a firearm, assaulted Delontae Kelly with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

TWENTY-NINTH COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the twenty-sixth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTIETH COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did possess a firearm while committing the crime of aggravated assault while armed as set forth in the twenty-seventh count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-FIRST COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did possess a firearm while committing the crime of assault with intent to kill as set forth in the twenty-eighth county of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-SECOND COUNT:

On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Murder of Sean Robinson and Shooting of T.B. and M.W.

THIRTY-THIRD COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," and a person whose identity is unknown to the grand jury, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Sean Robinson by shooting him with a firearm on or about August 11, 2010, thereby causing injuries from which Sean Robinson died on or about August 11, 2010. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

THIRTY-FOURTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," and a person whose identity is unknown to the grand jury, while armed with a firearm, assaulted T.B. with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

THIRTY-FIFTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," and a person whose identity is unknown to the grand jury, while armed with a firearm, assaulted M.W. with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

THIRTY-SIXTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," and a person whose identity is unknown to the grand jury, did possess a firearm while committing the crime of first degree murder while armed as set forth in the thirty-third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-SEVENTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," and a person whose identity is unknown to the grand jury, did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the thirty-fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-EIGHTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," and a person whose identity is unknown to the grand jury, did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the thirty-fifth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-NINTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as “Chop” or “Chopper” or “Flaca,” did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Assault on Special Police Officer Francis Maduwuba

FORTIETH COUNT:

On or about August 27, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” without justifiable and excusable cause, did assault, resist, oppose, impede, intimidate, and interfere with, Special Police Officer Francis Maduwuba, a law enforcement officer operating in the District of Columbia, knowing Special Police Officer Francis Maduwuba to be a police officer, while Special Police Officer Francis Maduwuba was engaged in or on account of the performance of his official duties. (Assaulting, Resisting or Interfering with a Police Officer (Misdemeanor), in violation of 22 D.C. Code, Section 405(b) (2001 ed.))

FORTY-FIRST COUNT:

Between on or about August 28, 2010 and on or about September 17, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” made threats to do bodily harm to Special Police Officer Francis Maduwuba. (Threats To Do Bodily Harm, in violation of 22 D.C. Code, Section 407 (2001 ed.))

FORTY-SECOND COUNT:

Between on or about August 28, 2010 and on or about September 17, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

Murder of Jamal Coates and Shooting of Phillip Thompson and Mico Thompson

FORTY-THIRD COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” Lester D. Williams, also known as “Les,” Marcellus E. Jackson, also known as “Cool,” and other persons whose identities are known and unknown to the grand jury, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Jamal Coates by shooting him with a firearm on or about September 28, 2010, thereby causing injuries from which Jamal Coates died on or about September 28, 2010. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

FORTY-FOURTH COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as “Frank White” or “K” or “Ki,” Lester D. Williams, also known as “Les,” Marcellus E. Jackson, also known as “Cool,” and other persons whose identities are known and unknown to the grand jury, while armed with a firearm, assaulted Phillip Thompson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FORTY-FIFTH COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," Marcellus E. Jackson, also known as "Cool," and other persons whose identities are known and unknown to the grand jury, while armed with a firearm, assaulted Mico Thompson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FORTY-SIXTH COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of first degree murder while armed as set forth in the forty-third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FORTY-SEVENTH COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the forty-fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FORTY-EIGHTH COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the forty-fifth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FORTY-NINTH COUNT:

On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did carry, openly and concealed on or about their persons, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Keir Johnson's Failure to Appear in Court on October 5, 2010

FIFTIETH COUNT:

On or about October 5, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," previously on September 17, 2010 having been arrested for committing a an offense and given a citation requiring him to appear in Court on October 5, 2010, willfully failed to appear before the Court as required. (Failure to Appear, in violation of 23 D.C. Code, Section 1110 (2001 ed.))



Stabbing of Joseph McCrae

FIFTY-FIRST COUNT:

On or about May 16, 2011, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did unlawfully, knowingly, and intentionally possess Class A contraband, that is a shank or homemade knife, on the grounds of a penal institution. (Unlawful Possession of Contraband In A Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b) (2001 ed.))

FIFTY-SECOND COUNT:

On or about May 16, 2011, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did unlawfully, knowingly, and intentionally possess Class A contraband, that is handcuff keys, on the grounds of a penal institution. (Unlawful Possession of Contraband In A Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b) (2001 ed.))

FIFTY-THIRD COUNT:

On or about May 16, 2011, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," assaulted Joseph McCrae with intent to kill him. (Assault With Intent To Kill, in violation of 22 D.C. Code, Section 401 (2001 ed.))

Obstructions of Justice

FIFTY-FOURTH COUNT:

On or about January 13, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Lester D. Williams, also known as "Les," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

FIFTY-FIFTH COUNT:

Between on or about September 29, 2010 and on or about November 30, 2010, within the District of Columbia, Marcellus E. Jackson, also known as "Cool," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

FIFTY-SIXTH COUNT:

On or about November 3, 2010, at approximately 7:03 p.m., within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Marcellus E. Jackson, also known as "Cool," and Ricardo D. Epps, also known as "Cardo," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

FIFTY-SEVENTH COUNT:

On or about November 3, 2010, at approximately 10:06 p.m., within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

Possession of a Firearm on December 5, 2011

FIFTY-EIGHTH COUNT:

On or about December 5, 2011, within the District of Columbia, Lester D. Williams, also known as "Les," did possess a certain firearm, without being the holder of a valid registration certificate. (Possession Of Unregistered Firearm, in violation of 7 D.C. Code, Section 2502.01(a) (2001 ed.))

FIFTY-NINTH COUNT:

On or about December 5, 2011, within the District of Columbia, Lester D. Williams, also known as "Les," did possess ammunition without being the holder of a valid registration certificate for a firearm. (Unlawful Possession Of Ammunition, in violation of 7 D.C. Code, Section 2506.01(3) (2001 ed.))

G-rod Criminal Street Gang

SIXTIETH COUNT TO ONE HUNDRED-SIXTEENTH COUNTS:

(1) The allegations set forth in the first count are realleged and incorporated by reference as though fully set forth herein.

(2) Members of the criminal organization known by various names, including but not limited to, "14th and Girard," "1-4," "G-rod," or "Cut Crew," were members of a criminal street gang that had as one of its purposes and frequent activities the violation of the criminal laws of the District of Columbia, including 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 48 D.C. Code Sections 904.01 (2001 ed.).

(3) Between July 1, 2006 and the present, in the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Ricardo D. Epps, also known as "Cardo," Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," Keir M. Johnson also known as "Frank White" or "K" or "Ki," Lester D. Williams also known as "Les," and other persons whose identities are known and unknown to the grand jury, each a member or active participant of the G-rod criminal street gang, knowingly and willfully engaged in acts of narcotics trafficking for the benefit of or in association with other G-rod members, including in the following offenses:

(A) On or about July 1, 2006, Lester D. Williams distributed marijuana to an undercover police officer in exchange for money in the 1400 block of Girard Street, N.W., Washington, D.C.;

(B) On or about July 1, 2006, Lester D. Williams possessed marijuana with an intent to distribute it in the 1400 block of Girard Street, N.W., Washington, D.C.; and

(C) On or about July 1, 2006, Lester D. Williams possessed crack cocaine with an intent to distribute it in the 1400 block of Girard Street, N.W., Washington, D.C.

(4) On or about July 1, 2006 to present, within the District of Columbia, the defendants listed below, and other persons whose identities are known and unknown to the grand jury, each a member or active participant of the G-rod criminal street gang, knowingly and willfully participated in certain felonies or violent misdemeanors alleged in the specified counts of the Indictment, which are realleged and incorporated by reference as though fully set forth herein, which felonies and violent misdemeanors were committed for the benefit of, at the direction of, and in association with any other member or participant of that criminal street gang.

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
61	7/1/06 - present	Lafonte L. Carlton Devyn L. Black Robert Givens Marcellus E. Jackson Keir M. Johnson Lester D. Williams	Conspiracy, in violation of 22 D.C. Code, Section 1805a (2001 ed.)	1
62	12/10/08	Lafonte L. Carlton Devyn L. Black	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	2
63	12/10/08	Lafonte L. Carlton Devyn L. Black	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	3
64	12/10/08	Lafonte L. Carlton Devyn L. Black	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	4

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
65	12/10/08	Lafonte L. Carlton Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	5
66	12/10/08	Lafonte L. Carlton Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	6
67	12/10/08	Lafonte L. Carlton Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	7
68	12/10/08	Lafonte L. Carlton Devyn L. Black	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	8

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
69	1/3/09	Devyn L. Black	Attempt to Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.)	9
70	1/3/09	Devyn L. Black	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	10
71	1/3/09	Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	11
72	1/3/09	Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	12

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
73	1/3/09	Devyn L. Black	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	13
74	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	First Degree Murder While Armed – Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	14
75	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	15
76	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Attempt to Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.)	16



<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
77	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	17
78	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	18
79	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	19
80	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	20

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
81	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	21
82	1/9/09	Lafonte L. Carlton	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	22
83	1/13/09	Lafonte L. Carlton	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	24
84	6/27/10	Keir M. Johnson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	26

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
85	6/27/10	Keir M. Johnson	Aggravated Assault While Armed, in violation of 22 D.C. Code Section 404.01, 4502 (2001 ed.)	27
86	6/27/10	Keir M. Johnson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	28
87	6/27/10	Keir M. Johnson	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	29
88	6/27/10	Keir M. Johnson	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	30

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
89	6/27/10	Keir M. Johnson	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	31
90	6/27/10	Keir M. Johnson	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	32
91	8/11/10	Robert Givens Marcellus E. Jackson	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	33
92	8/11/10	Robert Givens Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	34

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
93	8/11/10	Robert Givens Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	35
94	8/11/10	Robert Givens	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	36
95	8/11/10	Robert Givens	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	37
96	8/11/10	Robert Givens	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	38

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
97	8/11/10	Robert Givens	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	39
98	8/27/10	Keir M. Johnson	Assaulting, Resisting or Interfering with a Police Officer (Misdemeanor), in violation of 22 D.C. Code, Section 405(b) (2001 ed.)	40
99	Between 8/28/10 to on or about 9/17/10	Keir M. Johnson	Threats to Do Bodily Harm, in violation of 22 D.C. Code, Section 407 (2001 ed.)	41
100	Between 8/28/10 and on or about 9/17/10	Keir M. Johnson	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	42

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
101	9/28/10	Keir M. Johnson Lester D. Williams Marcellus E. Jackson	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	43
102	9/28/10	Keir M. Johnson, Lester D. Williams Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	44
103	9/28/10	Keir M. Johnson Lester D. Williams Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	45
104	9/28/10	Keir M. Johnson Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	46

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
105	9/28/10	Keir M. Johnson Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	47
106	9/28/10	Keir M. Johnson Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	48
107	9/28/10	Keir M. Johnson Lester D. Williams	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	49
108	5/16/10	Lafonte L. Carlton	Unlawful Possession of Contraband in a Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b)	51



<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
109	5/16/10	Lafonte L. Carlton	Unlawful Possession of Contraband in a Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b)	52
110	5/16/10	Lafonte L. Carlton	Assault With Intent To Kill, in violation of 22 D.C. Code, Section 401 (2001 ed.)	53
111	1/13/09	Lafonte L. Carlton Lester D. Williams	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	54
112	9/29/10 to on or about 11/30/10	Marcellus E. Jackson	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	55
113	11/3/10	Lafonte L. Carlton Marcellus E. Jackson	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	56

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
114	11/3/10	Lafonte L. Carlton Keir M. Johnson	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	57
115	12/5/11	Lester D. Williams	Possession Of Unregistered Firearm, in violation of 7 D.C. Code, Section 2502.01(a) (2001 ed.)	58
116	12/5/11	Lester D. Williams	Unlawful Possession Of Ammunition, in violation of 7 D.C. Code, Section 2506.01(3) (2001 ed.))	59

(Criminal Street Gang Affiliation, in violation of 22 D.C. Code, Section 951(b)(1) (2001 ed.))

*Ronald C. Machen Jr.*

RONALD C. MACHEN JR.  
Attorney of the United States in  
and for the District of Columbia

A TRUE BILL:

*Pamela M. Johnson*, 10/23/2012  
Foreperson

SUPERIOR COURT

OF THE

DISTRICT OF COLUMBIA

SUPERIOR COURT OF  
THE DISTRICT OF COLUMBIA  
CRIMINAL DIVISION

2012 PCI 23 P 14

Holding a Criminal Term

Grand Jury Sworn in on September 19, 2011

THE UNITED STATES OF AMERICA	:	Criminal Nos: 2009 CF1 002319 (Carlton)
	:	2010 CF1 014920 (Givens)
v.	:	2011 CF1 023409 (Black)
	:	2011 CF1 023408 (Jackson)
LAFONTE L. CARLTON,	:	2011 CF1 023407 (Johnson) ✓
also known as Fonte	:	2011 CF1 023394 (Williams)
also known as Fonny	:	
PDID: 583-006	:	Violations:
	:	22 D.C. Code, Section 1805a;
ROBERT GIVENS,	:	22 D.C. Code, Sections 2101, 4502;
also known as Chop	:	22 D.C. Code, Sections 401, 4502;
also known as Chopper	:	22 D.C. Code, Section 4504(b);
also known as Flaca	:	22 D.C. Code, Section 4504(a);
PDID: 624-234	:	22 D.C. Code, Sections 2802, 4502, 1803;
	:	23 D.C. Code, Section 1328(a)(1);
DEVYN L. BLACK,	:	22 D.C. Code, Section 405(b);
also known as Bunz	:	22 D.C. Code, Section 407;
also known as Hamburger	:	22 D.C. Code Section 722(a)(6);
PDID : 572-314	:	23 D.C. Code, Section 1110;
	:	22 D.C. Code, Section 2603.02(b);
MARCELLUS E. JACKSON,	:	22 D.C. Code, Section 401;
also known as Cool	:	7 D.C. Code, Section 2502.01(a)
PDID: 570-973	:	7 D.C. Code, Section 2506.01(3)
	:	22 D.C. Code, Section 951(b)(1) (2001 ed.)
KEIR M. JOHNSON,	:	
also known as Frank White ✓	:	(Conspiracy; First Degree Murder While
also known as K	:	Armed (Premeditated); Assault With Intent To
also known as Ki	:	Kill While Armed; Possession Of a Firearm
PDID: 607-725	:	During Crime Of Violence Or Dangerous
	:	Offense; Carrying a Pistol Without a License
LESTER D. WILLIAMS,	:	(Outside Home or Place of Business); Attempt
also known as Les	:	To Commit Robbery While Armed; Offenses
PDID: 582-771	:	Committed During Release;

(Continued on next page)

: Assaulting, Resisting or Interfering with a  
: Police Officer (Misdemeanor); Threats To Do  
: Bodily Harm; Obstructing Justice (Due  
: Administration of Justice); Failure to Appear;  
: Unlawful Possession of Contraband In A Penal  
: Institution; Assault With Intent To Kill;  
: Possession of Unregistered Firearm; Unlawful  
: Possession of Ammunition; Criminal Street  
: Gang Affiliation)

Superseding Indictment

The Grand Jury charges:

FIRST COUNT:

From or about July 1, 2006 to the present, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," Ricardo D. Epps, also known as "Cardo," Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," and other persons whose identities are known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree together to commit robberies, possess firearms, threaten, assault, and kill anyone whose interests were contrary to those of the defendants and their associates, and to obstruct justice, in violation of 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 7 D.C. Code Section 2502.01.

### Background of the Conspiracy

From on or about July 1, 2006 to the present, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," Ricardo D. Epps, also known as "Cardo," Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," and other persons whose identities are known and unknown to the grand jury, did knowingly and willfully combine, conspire, confederate, and agree together to threaten, assault, and kill anyone whose interests were contrary to those of the defendants and their associates in the criminal organization known by various names, including but not limited to, "14th and Girard," "1-4," "G-rod," or "Cut Crew," and to obstruct justice in order to prevent the successful prosecution by law enforcement of defendants and their associates in that criminal organization, in violation of 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 7 D.C. Code Section 2502.01.

### Object

At all times relevant to this Indictment the defendants and others known and unknown to the Grand Jury were members of the criminal organization known by various names, including but not limited to, "14th and Girard," "1-4," "G-rod," or "Cut Crew," (hereinafter referred to as "G-Rod" in the case of the criminal organization, and in the case of members, by name, alias, or a designated number, such as "G-rod member #1") a criminal street gang whose object was to control for its exclusive use, criminal and otherwise, the area centering on the 1400 block of Girard Street N.W. and the 1400 block of Fairmont Street, N.W., and including the surrounding territory, the boundaries of which fluctuated over time but generally consisted of an area bounded by Columbia Street, N.W., to the north, Fairmont Street, N.W., to the south, 16th Street, N.W., to the west, and Georgia Avenue, N.W., to the east (hereinafter the "turf"), and to avoid detection and successful prosecution by law enforcement.

### Goal

At all times relevant to this Indictment the goal of the defendants and their associates in the criminal organization known as G-Rod was to control its turf and avoid detection and successful prosecution by law enforcement using intimidation, threats, and violence, and by obstructing justice in violation of 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 7 D.C. Code Section 2502.01.

### Manners and Means

The defendants and their associates in G-Rod shared numerous common factors. They were residents of or otherwise associated with the turf and its environs. They were dedicated to reserving their turf to their exclusive use for criminal and or legitimate use and to avoid detection and successful prosecution by law enforcement. They were prepared to commit and did commit acts of intimidation, threats, violence, and obstruction of justice to exercise that control, avoid successful prosecution by law enforcement, and enhance the reputation of G-Rod for using intimidation, threats, and violence and thus facilitate G-Rod's control of the turf. In order to control, safeguard and protect G-Rod's turf and base of operations, and avoid detection and successful prosecution by law enforcement, the defendants and their associates in G-Rod used the following manners and means to advance their conspiracy:

(1) Members of G-Rod threatened, assaulted, or killed anyone whose interests were contrary to those of G-Rod, particularly members of rival criminal street gangs, including but not limited to, a criminal street gang known as "17th and Euclid" or "1-7" (hereinafter referred to as "1-7" in the case of the gang, and in the case of members, by name or alias), a criminal street gang known as "640," or "Park Morton" (hereinafter referred to as "640" in the case of the gang, and in the case of members, by name or alias), and a criminal street gang known as "Columbia Heights Village," "CHV," or the "V") (hereinafter referred to as "CHV" in the case of the gang, and in the case of members, by name or alias);

(2) Members of G-Rod retaliated for acts of violence perpetrated against other members of G-Rod;

(3) Members of G-Rod promoted and enhanced the reputation and stature of G-Rod;

(4) Members of G-Rod used acts of intimidation, threats, promises, bribes, and violence to protect the conspiracy and its members from detection, investigation, apprehension, and prosecution by law enforcement and from conviction of criminal charges, including by retaliation against anyone who assisted law enforcement officials in the investigation into and prosecution of members of G-Rod;

(5) Members of G-rod maintained regular contact with each other, even when they were arrested or incarcerated, to stay advised of the activities of other members of the conspiracy as well as to seek their assistance in locating and deterring witnesses from cooperating with law enforcement against G-rod members and their associates;

(6) Members of G-rod shared intelligence about the activities and locations of members of the conspiracy and their associates and members of rival criminal street gangs;

(7) Members of G-rod shared intelligence about the activities and locations of law enforcement and persons suspected of cooperating with law enforcement;

(8) Members of G-rod obtained, possessed, and shared weapons;

(9) Members of G-Rod financed the operations and lifestyle of the conspiracy's members and associates through robberies and trafficking in controlled substances, including sharing stash houses to process and store narcotics and sharing narcotics suppliers; and

(10) Members of G-rod protected illicit profits generated by the involvement of the conspiracy's members and associates in narcotics trafficking and robberies.

### Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the defendants and other persons whose identities are known and unknown to the grand jury, directly and indirectly, committed the following overt acts, among others, in the District of Columbia and elsewhere:

1. On or about December 23, 2006, Marcellus E. Jackson, carried a firearm in the area of the 1400 block of Girard Street, N.W., Washington, D.C.
2. On or about June 30, 2007, Marcellus E. Jackson, carried a firearm in the area of the 1500 block of Columbia Road, N.W., Washington, D.C.
3. On or about October 14, 2008, Devyn Black, did possess a firearm in the 1400 block of Girard Street, N.W., Washington, D.C.

### Murder of Derrell Goins and Shooting of Seandell Robinson

4. On or about December 10, 2008, in the District of Columbia, Lafonte L. Carlton and Devyn L. Black went together to the area of the 2200 block of Champlain Street, N.W., Washington, D.C. for the purpose of locating and assaulting persons associated with the rival 1-7 crew.
5. On or about December 10, 2008, Lafonte L. Carlton and Devyn L. Black shot and killed Derrell Goins, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in an alley in the 2200 block of Champlain Street, N.W., Washington D.C.
6. On or about December 10, 2008, Lafonte L. Carlton and Devyn L. Black shot Seandell Robinson, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in an alley in the 2200 block of Champlain Street, N.W., Washington D.C.
7. On or about December 10, 2008, Lafonte L. Carlton and Devyn L. Black shot at Denzil White, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in an alley in the 2200 block of Champlain Street, N.W., Washington D.C.



Attempted Robbery and Shooting of Nathaniel Morrison

8. On or about January 3, 2009, Devyn L. Black, while armed with a firearm, together with another person whose identity is unknown to the grand jury, demanded money from Nathaniel Morrison in the 1400 block of Fairmont Street, N.W., Washington, D.C.
9. On or about January 3, 2009, Devyn L. Black, while armed with a firearm, together with another person whose identity is unknown to the grand jury, shot Nathaniel Morrison in the 1400 block of Fairmont Street, N.W., Washington, D.C.

Murder of Paul Jones and Shooting of Theodore Rhem

10. On or about January 9, 2009, in the District of Columbia, Lafonte L. Carlton, Devyn L. Black, Lester D. Williams and other persons whose identities are known and unknown to the grand jury, met and discussed a plan to assault a person or persons associated with the "V," meaning the rival CHV crew.
11. On or about January 9, 2009, Lafonte L. Carlton, Devyn L. Black, Lester D. Williams, and other persons whose identities are known and unknown to the grand jury, went together to the area of the Columbia Heights Village located at the intersection of 14<sup>th</sup> and Columbia Road, N.W., Washington, D.C, for the purpose of locating and assaulting persons associated with the rival CHV crew.
12. On or about January 9, 2009, Lafonte L. Carlton, Devyn L. Black, Lester D. Williams, and other persons whose identities are known and unknown to the grand jury, chased, shot and killed Paul Jones, a person associated with the rival CHV crew, in the 1300 block of Columbia Road, N.W., Washington D.C.

13. On or about January 9, 2009, Lafonte L. Carlton, Devyn L. Black, and Lester D. Williams shot Theodore Rhem with the intent to kill Paul Jones in the 1300 block of Columbia Road, N.W., Washington D.C.

#### Arrest of Lafonte Carlton and Lester D. Williams

14. On or about January 13, 2009, Lafonte L. Carlton carried a pistol without a license in the area of the 1300 block of Girard Street, N.W., Washington D.C.
15. On or about January 13, 2009, Lester D. Williams assaulted a police officer while the officer was arresting Lafonte L. Carlton for carrying a pistol without a license, as set forth in Overt Act (14) above, in the area of the 1300 block of Girard Street, N.W., Washington D.C.
16. On or about January 13, 2009, Lafonte L. Carlton, and Lester D. Williams, after being arrested for the offenses referred to in Overt Acts (14-15) above, discussed and agreed to tell law enforcement and other persons they did not know each other in order to avoid successful prosecution.

#### Events From February 2009 until March 2009

17. On or about February 3, 2009, at approximately 7:11 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with an unindicted co-conspirator, whose identity is known to the grand jury (hereinafter "G-rod member #1"), and discussed steps that could be taken to disassociate Carlton from Lester D. Williams in order to hinder the prosecution of Carton and Williams for the shootings of Paul Jones and Theodore Rhem on January 9, 2009 and the carrying a pistol without a license and assault on a police officer committed on January 13, 2009, during which G-rod member #1 explained that IT planned to meet with "Les," meaning Lester D. Williams, the next day, and Carlton further stated that he and Williams had "already talked about that" and agreed "like when we get [sic] locked up, we already, you know, said we ain't know each other."

18. On or about February 3, 2009, at approximately 7:43 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Devyn L. Black and Lester D. Williams and discussed protecting the brother of Carlton, a member of G-rod, because Carlton was incarcerated and unable to do so; Williams' meeting with G-rod member #1 in order to discuss the steps G-rod members were taking to hinder the prosecution of Carlton and Williams; the names and activities of potential witnesses to the shootings of Paul Jones and Theodore Rhem and that these matters should not be discussed over the recorded telephones at the jail.
19. On or about February 24, 2009, at approximately 9:31 p.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with an unindicted member of G-rod, whose identity is unknown to the grand jury (hereinafter referred to as "G-rod member #2"), and discussed the failure of G-rod members to take action against persons Carlton identified as possibility cooperating with law enforcement against him, during which conversation, G-Rod Member #2 further stated that, "That shit far from over," and Carlton responded, "Oh yeah, most definitely."
20. On or about February 26, 2009, at approximately 9:44 p.m., in the District of Columbia, Lafonte L. Carlton, spoke with Devyn L. Black regarding the identity of the witnesses who were providing information to law enforcement about the shootings of Paul Jones and Theodore Rhem, and precautions to take when communicating with Carlton through letters because law enforcement personnel would open and review inmate letters.
21. On or about March 3, 2009, at approximately 7:36 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Keir M. Johnson regarding Carlton's safety at the District of Columbia jail and his need to be near other members of G-rod at that location, and exchanged information regarding the identity and locations of persons that may be providing information to law enforcement about the shootings of Paul Jones and Theodore Rhem.

Shooting of Anthony Butler

22. On or about June 18, 2009, Devyn L. Black shot Anthony Butler, a person associated with the rival CHV crew, after demanding Butler's necklace at gunpoint, in the area of the Columbia Heights Metro Station in the 1400 block of Irving Street.

Events From October 2009 Through August 2010

23. On or about October 14, 2009, in the District of Columbia, Devyn L. Black wrote a letter to Lafonte L. Carlton asking when Carlton's trial was scheduled and whether Carlton "ever [found] out who eatin that cheese," meaning whether Carlton had ever determined the identity of government witnesses in the Paul Jones murder case. . .
24. On or about July 17, 2010, a rap music video was created and posted on the Internet by a unindicted member of the conspiracy, whose identity is known to the grand jury, that promoted G-rod's reputation, membership, and the consequences when persons cooperate against its members with law enforcement.
25. Between on or about August 1, 2010 and on or about September 1, 2010, in the District of Columbia, Marcellus E. Jackson asked Brandon Miller to hold onto a bag containing ammunition for Jackson, which Miller agreed to accept and store at 1211 Girard Street, N.W., Washington, D.C.
26. Between on or about August 1, 2010 and on or about September 1, 2010, Brandon Miller met Keir M. Johnson at Johnson's apartment located at 1401 Fairmont Street, N.W., Apartment 112, Washington, D.C., at which time, Johnson gave Miller a bag containing an AK-47 style assault rifle and ammunition for that rifle, which Miller then stored at 1211 Girard Street, N.W., Washington, D.C.

27. Between on or about August 1, 2010 and on or about September 1, 2010, in the District of Columbia, Marcellus E. Jackson contacted Brandon Miller and asked him to hold onto a "Tec-22" machine gun and Miller agreed to do so.
28. Between on or about August 1, 2010 and on or about September 1, 2010, Brandon Miller met Marcellus E. Jackson in the approximate area of the 1400 block of Girard Street, N.W., Washington, D.C. and Jackson gave Miller a bag containing a "Tec-22" machine gun, which Miller then stored at 1211 Girard Street, N.W., Washington, D.C.

Shooting of Kevin Parker and Delontae Kelly

29. On or about June 27, 2010, Keir Johnson rode in a vehicle with an unindicted member of G-rod, whose identity is known to the grand jury (hereinafter referred to as "G-rod member #4"), into the parking lot of a gas station located in the 3400 block of Georgia Avenue, N.W., Washington, D.C., for the purpose of shooting at Kevin Parker and Delontae Kelly, two persons associated with the rival 640 crew.
30. On or about June 27, 2010, Keir Johnson chased and shot Kevin Parker, a person associated with the rival 640 crew, in the parking lot of the gas station located in the 3400 block of Georgia Avenue, N.W., Washington, D.C.
31. On or about June 27, 2010, Keir Johnson chased and shot at Delontae Kelly, a person associated with the rival 640 crew, in the parking lot of the gas station located in the 3400 block of Georgia Avenue, N.W., Washington, D.C.

Murder of Sean Robinson and Shootings of T.B. and M.W.

32. On or about August 11, 2010, at approximately 6:42 p.m., in the District of Columbia, Marcellus E. Jackson exchanged a telephone call with Robert Givens.

33. On or about August 11, 2010, in the District of Columbia, Marcellus E. Jackson, while driving his dark-colored 2004 Audi, picked up Robert Givens and another person, whose identity is unknown to the grand jury, and drove them to the area of 17<sup>th</sup> and Euclid Street, N.W., Washington, D.C.
34. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, shot and killed Sean Robinson, a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in the rear of the 2500 hlock of 17<sup>th</sup> Street, N.W., Washington, D.C.
35. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, shot at T.B., a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in the rear of the 2500 block of 17<sup>th</sup> Street, N.W., Washington, D.C.
36. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, shot at M.W., a person associated with the area of 17<sup>th</sup> and Euclid Streets, N.W., in the rear of the 2500 block of 17<sup>th</sup> Street, N.W., Washington, D.C.
37. On or about August 11, 2010, Robert Givens and another person, whose identity to unknown to the grand jury, entered the dark-colored 2004 Audi being driven by Marcellus E. Jackson near the intersection of Fuller and Mozart Streets, N.W., Washington, D.C., to escape after the shootings of Sean Robinson, T.B., and M.W, and Jackson drove them to the area of 14<sup>th</sup> and Fairmont Streets, N.W., Washington, D.C.
38. On or about August 11, 2010, at approximately 9:43 p.m., Robert Givens telephoned Marcellus E. Jackson, who was in the area of 14<sup>th</sup> and Fairmont Streets, N.W., Washington, D.C.
39. Between on or about August 11, 2010 and on or about September 17, 2010, in the District of Columbia, Marcellus E. Jackson burned or attempted to burn his 2004 dark-colored Audi in order to ensure it could not be located by law enforcement and identified as the vehicle used in the shootings of Sean Robinson, T.B. and M.W.

Events From August 13, 2010 Until September 28, 2011

40. On or about August 13, 2010, at approximately 4:35 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, during which conversation Carlton provided Epps with instructions to give to G-rod members involved in the murder of Sean Robinson in order to evade detection by law enforcement or retaliation by the 1-7 crew, with Carlton stating, "[T]ell him, man, make sure he stay low though man . . . Don't, tell him, don't be hanging up Girard man."
41. On or about August 27, 2010, in the 1400 block of Girard Street, N.W., Washington, D.C., Keir M. Johnson and others who are unknown to the grand jury surrounded uniformed Special Police Officer Francis Maduwuba, after he warned Johnson that he was being too loud and told Johnson to leave the area at which time Johnson spit and threw a bottle at Officer Maduwuba.
42. Between on or about August 28, 2010 and on or about September 17, 2010, Keir M. Johnson approached uniformed Special Police Officer Francis Maduwuba in the 1400 block of Fairmont Street, N.W., Washington, D.C., and threatened him in reference to the investigation of Johnson's assault on Officer Maduwuba on August 27, 2010 referred to in Overt Act (41) above, during which Johnson told Officer Maduwuba, "To mind [his] business [and Johnson would] mind his own business. That way nobody get hurt."
43. On or about August 30, 2010, in the District of Columbia, Lafonte L. Carlton wrote a letter to Robert Givens informing him of the identity of a person who may be "hot and going on you," meaning providing information to law enforcement against Givens in the investigation of the murder of Sean Robinson, and cautioned Givens about not making statements to law enforcement regarding Givens' role in the murder of Sean Robinson.

44. On or about September 10, 2010, at approximately 2:21 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with an unindicted co-conspirator, referred to as "Buk," whose identity is known to the grand jury, during which Carlton informed "Buk" of Carlton's concerns that another member of G-rod, whose identity is known to the grand jury (hereinafter referred to as "G-rod member #3"), was "hot," meaning assisting law enforcement.
45. On or about September 10, 2010, at approximately 2:21 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Lester D. Williams and informed him that Carlton had heard from other persons that an individual, who Carlton referred to as Williams' "man" and further identified as "Roland," was "hot," meaning assisting law enforcement, by "bringing undercovers around Benning Park and trying to buy guns and shit," and then Williams, who was with Marcellus E. Jackson, repeated the information about "Roland" he just received from Carlton to Jackson while Carlton remained on the phone.
46. On or about September 13, 2010, at approximately 6:50 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Keir M. Johnson and discussed how Carlton could obtain the assistance he needed to attack 1-7 Member "Fat Face" in the District of Columbia jail, their concerns that G-rod member #3 was "hot," meaning cooperating with law enforcement, and the steps Carlton planned to take to confront G-rod member #3.

Murder of Jamal Coates and Shootings of Phillip Thompkins and Mico Thompson

47. On or about September 28, 2010, Brandon Miller agreed to drive Lester D. Williams, Keir M. Johnson and Marcellus E. Jackson to the area of 13<sup>th</sup> and U Streets, N.W., Washington D.C.
48. On or about September 28, 2010, Brandon Miller stopped his vehicle, at the direction of Marcellus E. Jackson, in the area of the intersection of 12<sup>th</sup> and V Streets, N.W., Washington, D.C., at which time Jackson exited the vehicle.



49. On or about September 28, 2010, in the District of Columbia, Marcellus E. Jackson spoke by telephone with Brandon Miller and instructed Miller regarding the description of the vehicle which was occupied by rival 1-7 members near the intersection of 13<sup>th</sup> and U Streets, N.W., Washington, D.C.
50. On or about September 28, 2010, in the District of Columbia, Marcellus E. Jackson spoke by telephone with Brandon Miller and instructed Miller to provide Keir M. Johnson with the information set forth in Overt Act (49) above.
51. On or about September 28, 2010, near the intersection of intersection of 13<sup>th</sup> and U Streets, N.W., Washington, D.C., Lester D. Williams and Keir M. Johnson, while armed with firearms, exited Brandon Miller's vehicle for the purpose of shooting rival 1-7 members.
52. On or about September 28, 2010, Lester D. Williams and Keir M. Johnson shot and killed Jamal Coates, a rival 1-7 member, in the area of the 1300 block of U Street, N.W., Washington D.C.
53. On or about September 28, 2010, Lester D. Williams and Keir M. Johnson shot Philip Thompkins, a rival 1-7 member, in the area of the 1300 block of U Street, N.W., Washington D.C.
54. On or about September 28, 2010, Lester D. Williams and Keir M. Johnson shot at Mico Thompson, a rival 1-7 member, in the area of the 1300 block of U Street, N.W., Washington D.C.
55. On or about September 28, 2010, in the District of Columbia, Lester D. Williams and Keir M. Johnson reentered Brandon Miller's vehicle for the purpose of leaving the area after shooting at rival 1-7 members Jamal Coates, Phillip Thompkins, and Mico Thompson.
56. On or about September 28, 2010, in the District of Columbia, Keir M. Johnson asked Brandon Miller to store the firearms in his family residence used by Johnson and Lester D. Williams in the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.

Events from September 29, 2010 Until Present

57. Between on or about September 29, 2010 and on or about November 30, 2010, in the District of Columbia, Marcellus E. Jackson asked a person, whose identity is known to the grand jury (hereinafter referred to as "Person A"), to conduct a "three-way" telephone conversation with Miller, for purpose of ensuring Miller was not cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson, and Jackson further stated to Person A that after the "three-way" call, the child of Brandon Miller would be taken care of for the rest of ITS life.
58. On or about September 30, 2010, at approximately 9:03 a.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding Brandon Miller's arrest and whether Miller would likely cooperate with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson, during which conversation Epps stated that Carlton should confront Brandon Miller at the District of Columbia jail to convince him not to cooperate with law enforcement.
59. On or about October 1, 2010, at approximately 4:55 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps and instructed him on the precautions G-rod members should take to avoid detection by law enforcement as a result of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.
60. On or about October 4, 2010, at approximately 10:14 a.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding whether Brandon Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompkins, and Mico Thompson.

61. On or about October 4, 2010, at approximately 10:36 a.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding the possibility that the rival 1-7 crew would retaliate against Epps.
62. On or about October 26, 2010, at approximately 6:25 p.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding concerns that Lester D. Williams was providing information to other persons that was being leaked to law enforcement.
63. On or about November 1, 2010, at approximately 10:17 p.m., in the District of Columbia, Lafonte L. Carlton, spoke by telephone with Ricardo D. Epps regarding whether Brandon Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Philip Thompson, and Mico Thompson.
64. On or about November 2, 2010, at approximately 2:07 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton and Johnson discussed whether Brandon Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompson and Mico Thompson; Carlton's efforts to locate Miller at the jail; and Carlton's concern that Lester D. Williams was not maintaining a low-enough profile after the events of September 28, 2010.
65. On or about November 3, 2010, at approximately 7:03 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Marcellus E. Jackson, Jackson and Carlton agreed to send messages through Epps because jail telephone calls are recorded, and Carlton, Jackson, and Epps discussed whether Brandon Miller was cooperating with law enforcement, Miller's whereabouts, and the steps they could take to locate Miller.

66. On or about November 3, 2010, at approximately 10:06 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton and Johnson discussed whether Brandon Miller was cooperating with law enforcement, Miller's whereabouts, and the steps they could take to locate him, during which conversation Johnson asked Carlton whether he could obtain a "census sheet," meaning a document listing the locations of inmates.
67. On or about November 5, 2010, Ricardo D. Epps, attended a court hearing scheduled in the case of *United States v. Brandon Miller*, docket number 2010CF1018340, in courtroom 215 of the District of Columbia Superior Court, 500 Indiana Avenue, N.W., Washington, D.C, to determine whether Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompson and Mico Thompson.
68. On or about November 5, 2010, at approximately 7:35 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Lester D. Williams, Carlton discussed with Williams precautions that Williams should take to avoid detection by law enforcement and retaliation from the rival 1-7 crew, the whereabouts of Brandon Miller, steps they could take to locate Brandon Miller, and the location of rival 1-7 member Phillip Thompson at the District of Columbia jail.
69. On or about November 5, 2010, at approximately 7:51 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding what happened when Epps attended the court hearing in the case against Brandon Miller earlier in the day and Epps' concerns, based on his observations, that Miller was cooperating with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompson, and Mico Thompson.

70. On or about November 5, 2010, at approximately 7:51 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Lester D. Williams regarding Carlton's plan to contact 1-7 member Phillip Thompson to convince Thompson not to cooperate with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Phillip Thompson, and Mico Thompson.
71. On or about November 5, 2010, at approximately 8:21 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Keir M. Johnson, during which conversation Johnson instructed Carlton not to contact 1-7 member Phillip Thompson in an effort to get Thompson to refuse to cooperate with law enforcement in the investigation of the shootings of rival 1-7 members Jamal Coates, Thompson, and Mico Thompson.
72. On or about November 5, 2010, at approximately 8:21 p.m., in the District of Columbia, Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson discussed in a telephone conversation what happened when Epps attended the court hearing in the case against Brandon Miller earlier in the day, whether Brandon Miller was cooperating with law enforcement, and Miller's whereabouts.
73. On or about November 5, 2010, at approximately 8:36 p.m., in the District of Columbia, Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson discussed in a telephone conversation their ongoing efforts to locate Brandon Miller, during which conversation Johnson asked Carlton whether he had ever "check[ed] into them census sheets" used to track inmates, and Carlton, Epps, and Johnson discussed how a "census sheet" could be obtained.

74. On or about November 9, 2010, at approximately 11:19 a.m., in the District of Columbia, an unindicted co-conspirator known as "Big Dave," spoke with Marcellus E. Jackson by telephone, during which conversation "Big Dave" and Jackson discussed information "Big Dave" had received that Brandon Miller had been sent from the District of Columbia jail's protective custody unit to a facility in Virginia.
75. On or about November 9, 2010, at approximately 9:20 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, during which conversation Epps informed Carlton that Epps had been "subpoenaed" to appear before the grand jury in the case against "El's brother," meaning the case against Robert Givens for the murder of Sean Robinson, and Carlton and Epps agreed that they needed to stop using the recorded jail phones because they were being monitored by law enforcement.
76. On or about November 9, 2010, at approximately 9:36 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Marcellus E. Jackson, Carlton asked Jackson for money so that Carlton could obtain a cell phone at the jail to enable him to "call straight to ya'll" without using the recorded jail phones, and Jackson agreed to help provide the funds.

77. On or about November 10, 2010, Ricardo D. Epps, after being served with a subpoena to testify before a District of Columbia Superior Court grand jury investigating the case of *United States v. Robert Givens*, docket number 2010CF1014920, appeared at 555 4<sup>th</sup> Street, N.W., Washington, D.C., the location of the grand jury and the Office of the United States Attorney for the District of Columbia, and Epps falsely stated during an interview with an Assistant United States Attorney and members of the Metropolitan Police Department that he was not part of the “beef” or conflict between G-rod and 1-7 and that he had no knowledge about the shootings of Sean Robinson, T.B., and M.W.
78. On or about November 11, 2010, at approximately 4:56 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding the events that occurred when Epps responded to a subpoena to appear before the grand jury and their concerns about the government’s investigation, during which conversation Epps instructed Carlton that he needed to stop “writing them letters” to other persons, such as other members of G-rod.
79. On or about November 11, 2010, at approximately 5:12 p.m., in the District of Columbia, in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton and Johnson discussed the events that occurred when Epps responded to a subpoena to appear before the grand jury, their concerns persons were cooperating with law enforcement, the need to stop talking over recorded jail telephones, and Carlton’s plans to obtain money from Marcellus E. Jackson so that he could communicate with Johnson and others using a cell phone.

80. On or about November 11, 2010, at approximately 9:28 p.m., in a telephone conversation between Lafonte L. Carlton, Ricardo D. Epps, and Keir M. Johnson, Carlton informed Johnson and Epps of the amount of money he needed, beyond the amount promised by Marcellus E. Jackson, in order for Carlton to obtain a cell phone to communicate with them because he did not want to use the recorded jail phones anymore, and Johnson and Epps agreed to provide him with funds.
81. On or about November 17, 2010, at approximately 6:43 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding persons that may be cooperating with law enforcement, the steps Epps should take to avoid being recorded by law enforcement, and the code they agreed to use when referring to other members of G-rod as a result of their concerns about law enforcement monitoring their conversations.
82. On or about November 17, 2010, at approximately 7:00 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding Epps' next scheduled date to testify before a District of Columbia Superior Court grand jury, during which conversation Carlton instructed Epps that he could answer some of the questions in the grand jury if he wanted to, but that for any "wild" questions, Epps should just "plead the Fifth."
83. On or about November 18, 2010, at approximately 1:17 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, during which conversation they discussed the following: Carlton instructed Epps to inform other members of G-rod, including Marcellus E. Jackson, that the police had searched Carlton's jail cell and taken group photos and telephone numbers; Carlton further stated that they needed to change their telephone numbers; Epps agreed to "make sure I tell them" and "send a message up there," and that in future conversation, Carlton and Epps agreed they would "talk in person" because of concerns their telephone conversations were recorded and monitored.



84. Between on or about January 1, 2011 and on or about January 28, 2011, in the District of Columbia, Marcellus E. Jackson asked Person A to conduct a "three way" telephone conversation with Jackson when the other person spoke on the telephone with Brandon Miller.
85. On or about January 28, 2011, Brandon Miller spoke on the telephone with Marcellus E. Jackson, during which conversation Jackson instructed Miller not to talk on recorded jail phones or to persons he did not know; Jackson agreed to pass on a message from Miller to Keir M. Johnson and Lester D. Williams that Miller did not intend to cooperate with law enforcement against them in the investigation of the shootings of Jamal Coates, Phillip Thompson, and Mico Thompson; and Jackson promised Miller that he would send him money and take care of him and his family.
86. On or about February 13, 2011, at approximately 9:35 p.m., in the District of Columbia, Robert Givens spoke on the telephone with a person whose identity is unknown to the grand jury, during which conversation Givens informed the person that he saw Brandon Miller at the jail, but Givens did not confront Miller because, among other reasons, Miller knew too much about Givens.
87. On or about February 16, 2011, at approximately 12:20 p.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding how law enforcement could have learned that Carlton had arranged to have Devyn L. Black transferred from an out-of-state prison to the District of Columbia jail; that Devyn L. Black had been questioned by law enforcement about, among other things, Keir M. Johnson; concerns that law enforcement may be learning information by monitoring Carlton's recorded jail calls with Epps, and Carlton's need to "get a phone," meaning a cell phone, so that he could make unrecorded calls.
88. On or about May 16, 2011, Lafonte L. Carlton, possessed a hand-made knife and a handcuff key inside the District of Columbia jail in the event that he encountered a member of the rival 1-7 crew.

89. On or about May 16, 2011, at the District of Columbia jail, Lafonte L. Carlton, assaulted and stabbed 1-7 member Joseph McCrae, also known as "Fat Face" or "Poe," with the hand-made knife described in Over Act (88) above.
90. On or about June 23, 2011, at approximately 11:08 a.m., in the District of Columbia, Lafonte L. Carlton spoke by telephone with Ricardo D. Epps, who relayed messages between Carlton and Devyn L. Black, whom Epps was speaking to on another telephone line, during which conversation Carlton instructed Epps to tell Black that someone was providing information to law enforcement in the case against Carlton for the murder of Paul Jones.
91. On or about June 23, 2011, at approximately 11:08 a.m., Lafonte L. Carlton spoke by telephone with Ricardo D. Epps regarding the identity of a person that, based on Carlton's conversation with a rival member of 1-7 referred to as "Torian," Carlton believed was cooperating with law enforcement in the case against Robert Givens for the shootings of Sean Robinson, M.W., and T.B., and Epps instructed Carlton that he should "glass that nigga," meaning assault "Torian," rather to speak with him.
92. On or about December 5, 2011, Lester D. Williams, did possess a firearm at 1437 Somerset Street, N.W., Washington D.C.

(Conspiracy, in violation of 22 D.C. Code, Section 1805a (2011 ed.)).

Murder of Derrell Goins and Shooting of Seandell Robinson

SECOND COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," while armed with a firearm, purposely and with deliberate and premeditated malice, killed Derrell Goins with a firearm on or about December 10, 2008, thereby causing injuries from which Derrell Goins died on or about December 10, 2008. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

THIRD COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," while armed with a firearm, assaulted Seandell Robinson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FOURTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," while armed with a firearm, assaulted Denzil White with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FIFTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of first degree murder while armed as set forth in the second count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SIXTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

SEVENTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

EIGHTH COUNT:

On or about December 10, 2008, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Devyn L. Black, also known as "Bunz" or "Hamburger," did carry, openly and concealed on or about their persons, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Attempted Robbery and Shooting of Nathaniel Morrison

NINTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," together with another person whose identity is unknown to the grand jury, while armed with a firearm, did attempt, by force and violence, against resistance and by putting in fear, to steal and take money, from the person and from the immediate actual possession of Nathaniel Morrison. (Attempt To Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.))

TENTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," together with another person whose identity is unknown to the grand jury, while armed with a firearm, assaulted Nathaniel Morrison with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

ELEVENTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of attempt to commit robbery while armed as set forth in the ninth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

TWELFTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the tenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTEENTH COUNT:

On or about January 3, 2009, within the District of Columbia, Devyn L. Black, also known as "Bunz" or "Hamburger," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Murder of Paul Jones and Shooting of Theodore Rhem

FOURTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, in perpetrating and attempting to perpetrate the crime of robbery, killed Paul Jones by shooting him, thereby causing injuries from which Paul Jones died on or about January 9, 2009. (First Degree Murder While Armed - Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

FIFTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, purposely and with deliberate and premeditated malice, killed Paul Jones with a firearm on or about January 9, 2009, thereby causing injuries from which Paul Jones died on or about January 9, 2009. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

SIXTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, did attempt, by force and violence, against resistance and by putting in fear, to steal and take money or other items of value, from the person and from the immediate actual possession of Paul Jones. (Attempt To Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.))

SEVENTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," while armed with a firearm, assaulted Theodore Rhem with intent to kill Paul Jones. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

EIGHTEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of first degree murder while armed – felony murder as set forth in the fourteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

NINETEENTH COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of first degree murder while armed as set forth in the fifteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))



**TWENTIETH COUNT:**

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of attempted robbery while armed as set forth in the sixteenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

**TWENTY-FIRST COUNT:**

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Devyn L. Black, also known as "Bunz" or "Hamburger," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the seventeenth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

**TWENTY-SECOND COUNT:**

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

TWENTY-THIRD COUNT:

On or about January 9, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," having previously been released pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2008CMD27895, committed while so released the crimes of murder, assault with intent to kill, possession of a firearm during a crime of violence or dangerous offense, and carrying a pistol without a license (outside home or place of business), which are all felonies, as set forth in the fourteenth to twenty-second counts of this indictment. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328(a)(1))

TWENTY-FOURTH COUNT:

On or about January 13, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

TWENTY-FIFTH COUNT:

On or about January 13, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," having previously been released pursuant to the provisions of Title 23 of the District of Columbia Code in Superior Court Case Number 2008CMD27895, committed while so released the crime of carrying a pistol without a license, a felony, as set forth in the twenty-fourth count of this indictment. (Offenses Committed During Release, in violation of 23 D.C. Code, Section 1328(a)(1))

Shooting of Kevin Parker and Delontae Kelly

TWENTY-SIXTH COUNT:

8 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," while armed with a firearm, assaulted Kevin Parker with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

TWENTY-SEVENTH COUNT:

3 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," while armed with a firearm, did by any means, knowingly and purposely cause serious bodily injury to Kevin Parker. (Aggravated Assault While Armed, in violation of 22 D.C. Code, Section 404.01, 4502 (2001 ed.))

TWENTY-EIGHTH COUNT:

4 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," while armed with a firearm, assaulted Delontae Kelly with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

TWENTY-NINTH COUNT:

6 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did possess a firearm while committing the crime of assault with intent to kill while armed as set forth in the twenty-sixth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTIETH COUNT:

6 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did possess a firearm while committing the crime of aggravated assault while armed as set forth in the twenty-seventh count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-FIRST COUNT:

7 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did possess a firearm while committing the crime of assault with intent to kill as set forth in the twenty-eighth county of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-SECOND COUNT:

8 On or about June 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did carry, openly or concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Murder of Sean Robinson and Shooting of T.B. and M.W.

THIRTY-THIRD COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," and a person whose identity is unknown to the grand jury, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Sean Robinson by shooting him with a firearm on or about August 11, 2010, thereby causing injuries from which Sean Robinson died on or about August 11, 2010. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

THIRTY-FOURTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," and a person whose identity is unknown to the grand jury, while armed with a firearm, assaulted T.B. with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

THIRTY-FIFTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," and a person whose identity is unknown to the grand jury, while armed with a firearm, assaulted M.W. with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

THIRTY-SIXTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," and a person whose identity is unknown to the grand jury, did possess a firearm while committing the crime of first degree murder while armed as set forth in the thirty-third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-SEVENTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," and a person whose identity is unknown to the grand jury, did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the thirty-fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-EIGHTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," and a person whose identity is unknown to the grand jury, did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the thirty-fifth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

THIRTY-NINTH COUNT:

On or about August 11, 2010, within the District of Columbia, Robert Givens, also known as "Chop" or "Chopper" or "Flaca," did carry, openly and concealed on or about his person, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Assault on Special Police Officer Francis Maduwuba

FORTIETH COUNT:

9 On or about August 27, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," without justifiable and excusable cause, did assault, resist, oppose, impede, intimidate, and interfere with, Special Police Officer Francis Maduwuba, a law enforcement officer operating in the District of Columbia, knowing Special Police Officer Francis Maduwuba to be a police officer, while Special Police Officer Francis Maduwuba was engaged in or on account of the performance of his official duties. (Assaulting, Resisting or Interfering with a Police Officer (Misdemeanor), in violation of 22 D.C. Code, Section 405(b) (2001 ed.))

FORTY-FIRST COUNT:

10 Between on or about August 28, 2010 and on or about September 17, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," made threats to do bodily harm to Special Police Officer Francis Maduwuba. (Threats To Do Bodily Harm, in violation of 22 D.C. Code, Section 407 (2001 ed.))

FORTY-SECOND COUNT:

11 Between on or about August 28, 2010 and on or about September 17, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

Murder of Jamal Coates and Shooting of Phillip Thompson and Mico Thompson

FORTY-THIRD COUNT:

18 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," Marcellus E. Jackson, also known as "Cool," and other persons whose identities are known and unknown to the grand jury, while armed with a firearm, purposely and with deliberate and premeditated malice, killed Jamal Coates by shooting him with a firearm on or about September 28, 2010, thereby causing injuries from which Jamal Coates died on or about September 28, 2010. (First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.))

FORTY-FOURTH COUNT:

13 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," Marcellus E. Jackson, also known as "Cool," and other persons whose identities are known and unknown to the grand jury, while armed with a firearm, assaulted Phillip Thompson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))



FORTY-FIFTH COUNT:

14 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," Lester D. Williams, also known as "Les," Marcellus E. Jackson, also known as "Cool," and other persons whose identities are known and unknown to the grand jury, while armed with a firearm, assaulted Mico Thompson with intent to kill him. (Assault With Intent To Kill While Armed, in violation of 22 D.C. Code, Sections 401, 4502 (2001 ed.))

FORTY-SIXTH COUNT:

15 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did possess a firearm while committing the crime of first degree murder while armed as set forth in the forty-third count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FORTY-SEVENTH COUNT:

16 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the forty-fourth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FORTY-EIGHTH COUNT:

18 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did possess a firearm, while committing the crime of assault with intent to kill while armed as set forth in the forty-fifth count of this indictment. (Possession Of a Firearm During Crime Of Violence Or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.))

FORTY-NINTH COUNT:

18 On or about September 28, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," and Lester D. Williams, also known as "Les," did carry, openly and concealed on or about their persons, in a place other than his dwelling place, place of business or on other land possessed by him, a pistol, without a license issued pursuant to law. (Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.))

Keir Johnson's Failure to Appear in Court on October 5, 2010

FIFTIETH COUNT:

19 On or about October 5, 2010, within the District of Columbia, Keir M. Johnson, also known as "Frank White" or "K" or "Ki," previously on September 17, 2010 having been arrested for committing a an offense and given a citation requiring him to appear in Court on October 5, 2010, willfully failed to appear before the Court as required. (Failure to Appear, in violation of 23 D.C. Code, Section 1110 (2001 ed.))

Stabbing of Joseph McCrae

FIFTY-FIRST COUNT:

On or about May 16, 2011, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did unlawfully, knowingly, and intentionally possess Class A contraband, that is a shank or homemade knife, on the grounds of a penal institution. (Unlawful Possession of Contraband In A Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b) (2001 ed.))

FIFTY-SECOND COUNT:

On or about May 16, 2011, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," did unlawfully, knowingly, and intentionally possess Class A contraband, that is handcuff keys, on the grounds of a penal institution. (Unlawful Possession of Contraband In A Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b) (2001 ed.))

FIFTY-THIRD COUNT:

On or about May 16, 2011, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," assaulted Joseph McCrae with intent to kill him. (Assault With Intent To Kill, in violation of 22 D.C. Code, Section 401 (2001 ed.))

Obstructions of Justice

FIFTY-FOURTH COUNT:

On or about January 13, 2009, within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Lester D. Williams, also known as "Les," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

FIFTY-FIFTH COUNT:

Between on or about September 29, 2010 and on or about November 30, 2010, within the District of Columbia, Marcellus E. Jackson, also known as "Cool," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

FIFTY-SIXTH COUNT:

On or about November 3, 2010, at approximately 7:03 p.m., within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Marcellus E. Jackson, also known as "Cool," and Ricardo D. Epps, also known as "Cardo," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

FIFTY-SEVENTH COUNT:

20 On or about November 3, 2010, at approximately 10:06 p.m., within the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," and Keir M. Johnson, also known as "Frank White" or "K" or "Ki," did corruptly and by threat of force obstruct, impede or endeavor to obstruct and impede the due administration of justice in any official proceeding. (Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code Section 722(a)(6) (2001 ed.))

Possession of a Firearm on December 5, 2011

FIFTY-EIGHTH COUNT:

On or about December 5, 2011, within the District of Columbia, Lester D. Williams, also known as "Les," did possess a certain firearm, without being the holder of a valid registration certificate. (Possession Of Unregistered Firearm, in violation of 7 D.C. Code, Section 2502.01(a) (2001 ed.))

FIFTY-NINTH COUNT:

On or about December 5, 2011, within the District of Columbia, Lester D. Williams, also known as "Les," did possess ammunition without being the holder of a valid registration certificate for a firearm. (Unlawful Possession Of Ammunition, in violation of 7 D.C. Code, Section 2506.01(3) (2001 ed.))

G-rod Criminal Street Gang

SIXTIETH COUNT TO ONE HUNDRED-SIXTEENTH COUNTS:

(1) The allegations set forth in the first count are realleged and incorporated by reference as though fully set forth herein.

(2) Members of the criminal organization known by various names, including but not limited to, "14th and Girard," "1-4," "G-rod," or "Cut Crew," were members of a criminal street gang that had as one of its purposes and frequent activities the violation of the criminal laws of the District of Columbia, including 22 D.C. Code Sections 401, 405, 407, 722, 951, 1803, 1805, 2101, 2603.02, 2802, 4502, 4504 and 48 D.C. Code Sections 904.01 (2001 ed.).

(3) Between July 1, 2006 and the present, in the District of Columbia, Lafonte L. Carlton, also known as "Fonte" or "Fonny," Ricardo D. Epps, also known as "Cardo," Robert Givens, also known as "Chop" or "Chopper" or "Flaca," Marcellus E. Jackson, also known as "Cool," Keir M. Johnson also known as "Frank White" or "K" or "Ki," Lester D. Williams also known as "Les," and other persons whose identities are known and unknown to the grand jury, each a member or active participant of the G-rod criminal street gang, knowingly and willfully engaged in acts of narcotics trafficking for the benefit of or in association with other G-rod members, including in the following offenses:

(A) On or about July 1, 2006, Lester D. Williams distributed marijuana to an undercover police officer in exchange for money in the 1400 block of Girard Street, N.W., Washington, D.C.;

(B) On or about July 1, 2006, Lester D. Williams possessed marijuana with an intent to distribute it in the 1400 block of Girard Street, N.W., Washington, D.C.; and

(C) On or about July 1, 2006, Lester D. Williams possessed crack cocaine with an intent to distribute it in the 1400 block of Girard Street, N.W., Washington, D.C.

(4) On or about July 1, 2006 to present, within the District of Columbia, the defendants listed below, and other persons whose identities are known and unknown to the grand jury, each a member or active participant of the G-rod criminal street gang, knowingly and willfully participated in certain felonies or violent misdemeanors alleged in the specified counts of the Indictment, which are realleged and incorporated by reference as though fully set forth herein, which felonies and violent misdemeanors were committed for the benefit of, at the direction of, and in association with any other member or participant of that criminal street gang.

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
61 21	7/1/06 - present	Lafonte L. Carlton Devyn L. Black Robert Givens Marcellus E. Jackson Keir M. Johnson ✓ Lester D. Williams	Conspiracy, in violation of 22 D.C. Code, Section 1805a (2001 ed.)	1
62	12/10/08	Lafonte L. Carlton Devyn L. Black	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	2
63	12/10/08	Lafonte L. Carlton Devyn L. Black	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	3
64	12/10/08	Lafonte L. Carlton Devyn L. Black	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	4

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
65	12/10/08	Lafonte L. Carlton Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	5
66	12/10/08	Lafonte L. Carlton Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	6
67	12/10/08	Lafonte L. Carlton Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	7
68	12/10/08	Lafonte L. Carlton Devyn L. Black	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	8



<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
69	1/3/09	Devyn L. Black	Attempt to Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.)	9
70	1/3/09	Devyn L. Black	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	10
71	1/3/09	Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	11
72	1/3/09	Devyn L. Black	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	12

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
73	1/3/09	Devyn L. Black	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	13
74	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	First Degree Murder While Armed – Felony Murder, in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	14
75	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	15
76	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Attempt to Commit Robbery While Armed, in violation of 22 D.C. Code, Sections 2802, 4502, 1803 (2001 ed.)	16

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
77	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	17
78	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	18
79	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	19
80	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	20

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
81	1/9/09	Lafonte L. Carlton Devyn L. Black Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	21
82	1/9/09	Lafonte L. Carlton	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	22
83	1/13/09	Lafonte L. Carlton	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	24
84 22	6/27/10	Keir M. Johnson ✓	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	26

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
85 23	6/27/10	Keir M. Johnson ✓	Aggravated Assault While Armed, in violation of 22 D.C. Code Section 404.01, 4502 (2001 ed.)	27
86 24	6/27/10	Keir M. Johnson ✓	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	28
87 25	6/27/10	Keir M. Johnson ✓	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	29
88 26	6/27/10	Keir M. Johnson ✓	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	30

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
89 27	6/27/10	Keir M. Johnson ✓	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	31
90 28	6/27/10	Keir M. Johnson ✓	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	32
91	8/11/10	Robert Givens Marcellus E. Jackson	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	33
92	8/11/10	Robert Givens Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	34

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
93	8/11/10	Robert Givens Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	35
94	8/11/10	Robert Givens	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	36
95	8/11/10	Robert Givens	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	37
96	8/11/10	Robert Givens	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	38

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
97	8/11/10	Robert Givens	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	39
98 29	8/27/10	Keir M. Johnson ✓	Assaulting, Resisting or Interfering with a Police Officer (Misdemeanor), in violation of 22 D.C. Code, Section 405(b) (2001 ed.)	40
99 30	Between 8/28/10 to on or about 9/17/10	Keir M. Johnson ✓	Threats to Do Bodily Harm, in violation of 22 D.C. Code, Section 407 (2001 ed.)	41
100 31	Between 8/28/10 and on or about 9/17/10	Keir M. Johnson ✓	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	42



<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
101 32	9/28/10	Keir M. Johnson ✓ Lester D. Williams Marcellus E. Jackson	First Degree Murder While Armed (Premeditated), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	43
102 33	9/28/10	Keir M. Johnson, ✓ Lester D. Williams Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	44
103 34	9/28/10	Keir M. Johnson ✓ Lester D. Williams Marcellus E. Jackson	Assault With Intent to Kill While Armed, in violation of 22 D.C. Code, Section 401, 4502 (2001 ed.)	45
104 35	9/28/10	Keir M. Johnson ✓ Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	46

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
105 34	9/28/10	Keir M. Johnson ✓ Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	47
106 37	9/28/10	Keir M. Johnson ✓ Lester D. Williams	Possession of a Firearm During Crime of Violence or Dangerous Offense, in violation of 22 D.C. Code, Section 4504(b) (2001 ed.)	48
107 38	9/28/10	Keir M. Johnson ✓ Lester D. Williams	Carrying a Pistol Without a License (Outside Home or Place of Business), in violation of 22 D.C. Code, Section 4504(a) (2001 ed.)	49
108	5/16/10	Lafonte L. Carlton	Unlawful Possession of Contraband in a Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b)	51

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
109	5/16/10	Lafonte L. Carlton	Unlawful Possession of Contraband in a Penal Institution, in violation of 22 D.C. Code, Section 2603.02(b)	52
110	5/16/10	Lafonte L. Carlton	Assault With Intent To Kill, in violation of 22 D.C. Code, Section 401 (2001 ed.)	53
111	1/13/09	Lafonte L. Carlton Lester D. Williams	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	54
112	9/29/10 to on or about 11/30/10	Marcellus E. Jackson	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	55
113	11/3/10	Lafonte L. Carlton Marcellus E. Jackson	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	56

<u>Count</u>	<u>Date</u>	<u>Defendants</u>	<u>Predicate Offense</u>	<u>Count Number for Predicate Offense</u>
114 39	11/3/10	Lafonte L. Carlton Keir M. Johnson ✓	Obstructing Justice (Due Administration of Justice), in violation of 22 D.C. Code, Sections 2101, 4502 (2001 ed.)	57
115	12/5/11	Lester D. Williams	Possession Of Unregistered Firearm, in violation of 7 D.C. Code, Section 2502.01(a) (2001 ed.)	58
116	12/5/11	Lester D. Williams	Unlawful Possession Of Ammunition, in violation of 7 D.C. Code, Section 2506.01(3) (2001 ed.))	59

(Criminal Street Gang Affiliation, in violation of 22 D.C. Code, Section 951(b)(1) (2001 ed.))

*Ronald C. Machen Jr. 12/24*

RONALD C. MACHEN JR.  
Attorney of the United States in  
and for the District of Columbia

A TRUE BILL:



Foreperson

*10/23/2012*